

1 STEVEN G. KALAR
2 Federal Public Defender
3 GALIA AMRAM (CABN 250551)
4 Assistant Federal Public Defender
5 450 Golden Gate Avenue, Box 36106
6 San Francisco, CA 94102
7 Telephone: (415) 436-7700
8 Facsimile: (415) 436-7706
9 Galia_Amram@fd.org

10 Counsel for Defendant Jeffry HILL
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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,

17 No. 16-CR-454 RS

18 Plaintiff,

19 **STIPULATION AND [PROPOSED]**
20 **ORDER TO CONTINUE STATUS**
21 **CONFERENCE**

22 v.

23 JEFFRY HILL,

24 Defendant.

25 **I. STIPULATION**

26 The parties in this case agree and jointly request the Court to move the status conference
27 scheduled in the above captioned case from January 17, 2016 to February 7, 2016 at 2:30 p.m.
28 The reason for this request is that defense counsel requires additional time to review discovery,
which to date includes over 17,000 pages of accounting records, over 10,000 pages of other
paper discovery, and audio recordings and electronic device data. The next available date for all
parties is February 7th. The parties attempted to find an earlier date however the Court is

1 unavailable the week before, defense counsel is unavailable two weeks before, and the defendant
2 has a medical appointment three weeks before.

3 The parties concur that granting the exclusion would allow the reasonable time necessary
4 for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. §
5 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such an
6 exclusion of time for the purposes of effective preparation of counsel outweigh the best interest
7 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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10 DATED: January 10, 2017

_____ /s/
11 BENJAMIN KINGSLEY
Assistant United States Attorney

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13 DATED: January 10, 2017

_____ /s/
14 GALIA AMRAM
15 Attorney for Defendant Jeffry Hill
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18 ~~PROPOSED~~ ORDER

19 For the reasons stated above the Court hereby CONTINUES the status hearing in the
20 January
21 aforementioned case from ~~February~~ 17, 2017 to February 7, 2017. The Court further finds that
22 the exclusion from the time limits of this period applicable under 18 U.S.C. § 3161 is warranted
23 and that the ends of justice served by the continuance outweigh the best interests of the public
24 and the defendant in a speedy trial. Denying the requested exclusion of time would deprive the
25 defendant effective preparation of counsel, taking into account the exercise of due diligence. 18
26 U.S.C. § 3161(h)(7)(B)(iv).

27 IT IS SO ORDERED.
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1 DATED: 1/11/17



2 THE HONORABLE RICHARD SEEBORG
3 United States District Judge

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